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## UNITED STATES DISTRICT COURT

#### FOR THE CENTRAL DISTRICT OF CALIFORNIA

### SOUTHERN DIVISION

No. SA CR 1 SACR 14-00022

# INFORMATION

[29 U.S.C. § 501(c): Embezzlement and Theft of Labor Union Assets; 26 U.S.C. § 7206(1): Making and Subscribing to a False Income Tax Return]

The United States Attorney charges:

UNITED STATES OF AMERICA,

FRED W. CORRELL,

Plaintiff,

Defendant.

#### COUNT ONE

[29 U.S.C. § 501(c)]

During calendar year 2009, in Orange County, within the Central District of California, and elsewhere, defendant FRED W. CORRELL, while an officer of International Brotherhood of Teamsters, Graphic Communications Conference, District Council No. 2 ("the union"), namely, the Financial Secretary and Treasurer, embezzled, stole, and unlawfully and willfully abstracted and converted to his own use, and the use of others, \$10,000 of the moneys, funds, property, and

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other assets of the union, which was a labor organization based in Fullerton, California, and engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

## COUNT TWO

[26 U.S.C. § 7206(1)]

On or about October 15, 2010, in Orange County, within the Central District of California, defendant FRED W. CORRELL ("CORRELL") did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for himself and his wife, D.J.C., for tax year 2009, which was verified by a written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service, which said income tax return defendant CORRELL did not believe to be true and correct as to every material matter, in that said income tax return failed to report \$10,000 in income that defendant CORRELL received from International Brotherhood of Teamsters, Graphic Communications Conference, District Council No. 2, whereas, as defendant CORRELL then and there knew and believed, that \$10,000 in income should have been reported on the tax return.

ANDRÉ BIROTTE JR. United States Attorney

ROBERT E. DUGDALE

Assistant United States Attorney Chief, Criminal Division

DENNISE D. WILLETT Assistant United States Attorney Chief, Santa Ana Branch Office

CHARLES E. PELL Assistant United States Attorney Santa Ana Branch Office